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FILED

DEC 16 2021

Clerk, U S District Court
District Of Montana
Billings

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JENEE MARIE KLEIN, and
ETHAN ALAN WILLIAMS,**

Defendants.

CR 21- 114-BLG- DLC

INDICTMENT

**BANK FRAUD (Counts I-II)
Title 18 U.S.C. §§ 1344 and 2
(Penalty: 30 years imprisonment, \$250,000
fine, and five years supervised release)**

**AGGRAVATED IDENTITY THEFT
(Counts III-IV)
Title 18 U.S.C. §§ 1028A(a)(1) and 2
(Penalty: Mandatory minimum two years
imprisonment, consecutive to any other
punishment, \$250,000 fine, and one year
supervised release)**

THE GRAND JURY CHARGES:

COUNTS I-II

On or about May 11, 2021, at Billings, within Yellowstone County, in the

State and District of Montana, and elsewhere, the defendants, JENEE MARIE KLEIN and ETHAN ALAN WILLIAMS, knowingly executed and attempted to execute a material scheme and artifice to defraud Western Security Bank, a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses and promises, that is the defendants, JENEE MARIE KLEIN and ETHAN ALAN WILLIAMS, presented stolen, forged, and altered personal checks to Western Security Bank, with specific transactions identified in the table below, and in doing so obtained money owned by, and under the custody and control of Western Security Bank, all in violation of 18 U.S.C. §§ 1344 and 2.

| Count | Date | Check Amount | Bank Branch |
|--------------|-------------|---------------------|--------------------------------------------------------|
| I | 5/11/2021 | \$600.00 | Western Security Bank Grand Ave Branch |
| II | 5/11/2021 | \$1,300.00 | Western Security Bank Heights at Western Center Branch |

COUNT III

On or about May 11, 2021, at Billings, within Yellowstone County, in the State and District of Montana, the defendants, JENEE MARIE KLEIN and ETHAN ALAN WILLIAMS, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony

violation of 18 U.S.C. § 1344, bank fraud, as charged in count I above, and did aid and abet the same, in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

COUNT IV

On or about May 11, 2021, at Billings, within Yellowstone County, in the State and District of Montana, the defendants, JENEE MARIE KLEIN and ETHAN ALAN WILLIAMS, did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation of 18 U.S.C. § 1344, bank fraud, as charged in count II above, and did aid and abet the same, in violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


LEIF M. JOHNSON
United States Attorney


JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____

Warrant: ✓✓ both (Williams, State
Custody)

Bail: _____